

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : HON. TONIANNE J. BONGIOVANNI
:
v. : 25-mj-3001 (TJB)
:
CIARA BRASCOM : **CRIMINAL COMPLAINT**

I, Justin Notarfrancesco, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B

continued on the attached pages and made a part hereof.

/s/ Justin Notarfrancesco
Justin Notarfrancesco
Special Agent
Federal Bureau of Investigation

Attested to by telephone pursuant
to Fed. R. Crim. P. 4.1(b)(2)(A) on
January 27, 2025 in Trenton,
New Jersey



Honorable Tonianne J. Bongiovanni
United States Magistrate Judge

ATTACHMENT A

Count One
(Bank Robbery)

On or about July 28, 2024, in Mercer County, in the District of New Jersey, and elsewhere, the defendant,

CIARA BRASCOM,

did, by force, violence, and intimidation, knowingly take from the person and presence of others, namely, employees of Bank-1, located in or around Princeton, New Jersey, approximately \$60,500 in United States currency belonging to, and in the care, custody, control, management, and possession of Bank-1, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

ATTACHMENT B

I, Justin Notarfrancesco, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Because this Affidavit is being submitted for a limited purpose, I have not set forth every fact that I know concerning this investigation. Where the contents of documents and the actions and statements of others are reported herein, they are reported in substance and in part, except where otherwise indicated. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. As captured by surveillance footage, on or about July 28, 2024, at approximately 1:56 p.m., a woman wearing red prescription glasses, a blue hat with a white logo, and a blue medical face mask, later identified as the defendant, CIARA BRASCOM ("BRASCOM"), entered a bank located in Princeton, New Jersey ("Bank-1"). Bank-1 was scheduled to close at 2:00 p.m.

2. Inside the bank, BRASCOM approached a bank teller ("Victim Employee-1") and gave Victim Employee-1 a note that demanded cash and warned a gun would be used if Victim Employee-1 were to activate an alarm. BRASCOM removed from her front right pant pocket what appeared to be a black handgun and held it in the direction of Victim Employee-1.

3. In response, Victim Employee-1 showed BRASCOM that Victim Employee-1's cash drawer was empty. Victim Employee-1 and another bank employee ("Victim Employee-2") then accompanied BRASCOM inside the bank vault. Once inside the vault, the Victim Employees accessed the safe and gave BRASCOM approximately \$60,500 in cash.

4. BRASCOM, while carrying the money in her hands, exited Bank-1 through the front entrance/exit and left the vicinity on foot.

5. Victim Employee-1 then called a manager of Bank-1 to report the robbery. The manager, in turn, contacted police, who responded to the scene.

6. Through investigation, law enforcement agents identified BRASCOM as a suspect. On September 24, 2024, law enforcement agents interviewed BRASCOM at the Princeton Police Department. After being advised of her *Miranda* rights, BRASCOM voluntarily agreed to speak with law enforcement. During the interview, BRASCOM described certain financial difficulties, which fueled her desire to rob Bank-1 on July 28, 2024. She detailed how she decided to rob the bank on the morning of July 28, 2024, and developed her plan throughout the day. In particular, she admitted that she went to a store to purchase an imitation, toy gun that looked like an authentic

gun to use during the robbery. She stated that the store lacked such a toy gun, so she instead purchased a pack of water pistols and can of black spray paint. BRASCOM then went home and sprayed one of the guns with black paint to make it look more realistic. After the paint dried, BRASCOM drove to the vicinity of Bank-1 to commit the robbery. BRASCOM admitted that she provided Victim Employee-1 with a note that demanded along the lines of, "give me the money. Don't call the cops," but could not recall the precise text. BRASCOM recollected that she wanted more money than was available in Victim Employee-1's drawer so she escorted the Victim Employees to the bank vault. According to BRASCOM, after the Victim Employees accessed the safe inside the vault, they provided BRASCOM with money. After receiving the money, BRASCOM left Bank-1 through the front entrance/exit with the money in her hands because she lacked a bag.

7. BRASCOM explained that after the robbery, she returned home where she discarded the toy guns she purchased earlier in the day, the blue hat she was wearing, and the note used during the robbery.

8. At all times relevant to this Complaint, the deposits of Bank-1 were insured by the Federal Deposit Insurance Corporation.